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Attorneys for Plaintiffs
SPORTS SHINKO CO., LTD., and
SPORTS SHINKO (USA) CO., LTD.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

SPORTS SHINKO CO., LTD.,)	CIVIL NO. CV 04-00124
)	ACK/BMK
Plaintiff,)	
)	PLAINTIFFS' RESPONSE TO
vs.)	DEFENDANTS OR HOTEL,
)	LLC AND MILILANI GOLF
QK HOTEL, LLC, a Hawai'i)	CLUB LLC'S FIRST REQUEST
limited liability company,)	FOR ADMISSIONS; FIRST
)	REQUEST FOR ANSWERS TO
Defendant.)	INTERROGATORIES; AND
)	FIRST REQUEST FOR
)	PRODUCTION OF
)	DOCUMENTS TO PLAINTIFFS
)	SPORTS SHINKO CO., LTD.
)	AND SPORTS SHINKO (USA)
)	

**CO., LTD., DATED JANUARY
3, 2005**

SPORTS SHINKO (USA) CO.,
LTD., a Delaware corporation,

CIVIL NO. CV 04-00125
ACK/BMK

Plaintiff,

vs.

PUKALANI GOLF CLUB, LLC, a
Hawai'i limited liability company;
and KG MAUI DEVELOPMENT,
LLC, a Hawai'i limited liability
company,

Defendants.

SPORTS SHINKO (USA) CO.,
LTD, a Delaware corporation,

CIVIL NO. CV 04-00126
ACK/BMK

Plaintiff,

vs.

KIAHUNA GOLF CLUB, LLC, a
Hawai'i limited liability company;
KG KAUAI DEVELOPMENT, LLC,
a Hawai'i limited liability
company; PUKALANI GOLF
CLUB, LLC, a Hawai'i limited
liability company; KG MAUI
DEVELOPMENT, LLC, a Hawai'i
limited liability company;
MILILANI GOLF CLUB, LLC, a
Hawai'i limited liability company;

15. *Identify each and every owner of Stock of SS-USA as of February 20, 2004.*

Objection: Irrelevant to any claim or defense in this action and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, Plaintiffs answer as follows:

ANSWER:

Sports Shinko Co., Ltd.
Takamatsu Sports Shinko Country Co., Ltd.
Inagawakokusai Co., Ltd.
Amagase Onsen Country Co., Ltd
Suifu Kanko Co., Ltd.
Misaki Country Co., Ltd.
Suho Country Co., Ltd.
Tsuyama Sports Shinko Country Co., Ltd.
Boushuu Kaihatsu Co., Ltd.
Sanyo Kosan Co., Ltd.
Kinoshita Kensetsu Co., Ltd.
Higashinasu Country Club Co., Ltd.
Uresino Kanko Kaihatsu Co., Ltd.
Izumisano Country Co., Ltd.

16. *State when SS-Japan learned its creditors would commence Involuntary Insolvency Proceedings.*

Objection: Vague and ambiguous. Plaintiffs lack capacity to respond; calls for speculation as to former management's personal knowledge. Unduly burdensome, seeks privileged communications and attorney work product. Subject to ongoing discovery. Without waiving these objections, Plaintiffs respond as follows:

ANSWER:

VERIFICATION

JAPAN)
) SS:
OSAKA)

Yoshihiko Madaida, being first duly sworn on
oath, deposes and says:

That he is the President of SPORTS SHINKO
(USA) CO., LTD. and that he is an agent of SPORTS SHINKO (USA)
CO., LTD. for the purpose of answering the foregoing *requests for*
answers to interrogatories and for making this verification, and the
foregoing answers are true according to his knowledge, information,
and belief.

SPORTS SHINKO (USA) CO., LTD.

By


Its *President*

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